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June 24, 2022

VIA ECF

Magistrate Judge Hon. James L. Cott
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Free Holdings Inc. v. Kevin McCoy & Sotheby's Inc.*, Case No. 1:22-cv-00881-JLC; Extension of Page Limit for Motion to Dismiss Memorandum of Law

Dear Judge Cott:

We represent defendant Kevin McCoy in the above-referenced action. McCoy's response to Plaintiff's Amended Complaint is due on June 30, 2022. McCoy anticipates filing a motion to dismiss all claims (there are six causes of action alleged, including for declaratory judgment, unjust enrichment, slander of title, N.Y. GBL § 349, commercial disparagement, and Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a)). We respectfully submit this letter-motion pursuant to Your Honor's Individual Rule II.E to request that McCoy be granted a 5-page extension for his supporting memorandum of law (*i.e.*, from 25 pages to 30 pages). Plaintiff and co-defendant Sotheby's both consent to this request.

We thank the Court for its consideration.

Respectfully submitted,

William L. Charron

cc: All counsel (via ECF)